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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
CELSO MARTEARENA-ARRIOLA, )  
 )  
Defendant. )

No. CR 08-0272 SI

**GOVERNMENT'S NOTICE OF EXPERT  
TESTIMONY (RULE 16)**

Trial Date: June 30, 2008  
Pretrial Conf.: June 24, 2008

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and discovery previously provided in the matter, the government here discloses the expert testimony it intends to offer at trial. The government reserves its right to supplement this Notice as its trial preparation continues.

**I. Expert's Qualifications**

Kenneth Woods is a Senior Fingerprint Specialist with the Department of Homeland Security, Immigration and Customs Enforcement, Forensic Document Laboratory in McLean, Virginia. He has more than 20 years of experience in the field of fingerprint identification. He is qualified as an expert in fingerprint examination in the U.S. District Court for the Districts of

1 Arizona and the Virgin Islands. He has also been accepted as an expert in fingerprint  
2 examination in all three levels of court in Prince William County, Virginia.

3 The government provided a full summary of Mr. Woods' qualifications, as contained in his  
4 curriculum vitae, to the Defendant on June 9, 2008. *See* Bates No.CMA0423-0425.

5 **II. Expert's Opinions and Bases Therefor**

6 Mr. Woods will testify as to his review and examination of the fingerprints on the  
7 Warrants of Deportation and the fingerprints on the fingerprint cards contained in the  
8 Defendant's A-file. The government anticipates that Mr. Woods will offer his expert opinion  
9 that the fingerprints on each document that he reviewed and examined were made by the same  
10 individual. He will testify that his opinion was made by an analysis, comparison, and evaluation  
11 of the friction ridge detail on the documents he reviewed. Mr. Woods will also testify that his  
12 conclusions are based on the two fundamental principles of friction ridge identification: (1)  
13 friction ridges present in fingerprints begin to develop in the fetus and persist, unchanged, until  
14 after death when decomposition destroys the ridged skin and; (2) no two fingerprints are the  
15 same, even identical twins. Mr. Woods will further testify that the means of arriving at this  
16 conclusion was based on the standard ACE-V (Analysis, Comparison, Evaluation – Verification)  
17 methodology and he will further explain this methodology.

18 The government provided Mr. Woods' report of his analysis to the Defendant on June 9,  
19 2008. *See* Bates No. CMA0421-0422.

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21 DATED: June 13, 2008

Respectfully submitted,

22 JOSEPH P. RUSSONIELLO  
23 United States Attorney

24 \_\_\_\_\_/s/  
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